

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION

A.G., a minor child, by and through her
mother and next of friend, K.C.; D.A., a
minor child, by and through her mother
and next of friend, B.A.; A.L., a minor
child, by and through her mother and
next of friend, C.T.; M.K., a minor child,
by and through her mother and next of
friend, K.K.; and M.H., a minor child, by
and through her mother and next of
friend, B.H.,

Plaintiffs,

v.

AUTAUGA COUNTY BOARD OF
EDUCATION; JOSEPH L. BUTLER; DENE
CLEVELAND and TERRY WRIGHT,

Defendants.

CIV. ACT. NO.: 2:05cv1090-MEF

B.H., a minor child, by and through his
mother and next of friend, D.S.,

Plaintiffs,

v.

AUTAUGA COUNTY BOARD OF
EDUCATION; JOSEPH L. BUTLER; DENE
CLEVELAND and TERRY WRIGHT,

Defendants.

CIV. ACT. NO.: 2:06cv393-SRW

PLAINTIFF'S VOIR DIRE

1. Are any of you employees or stockholders on the board of directors
for Horace Mann Insurance Company or Alabama Risk Management for
Schools?

2. Do any of you know anything about the facts of this case?

3. Do any of you know Kate Holtberg or Mark Boardman, with the law firm of Boardman and Carr, 400 Boardman Drive, Chelsea, Alabama 35043? Have you or any business you worked for ever been represented by or consulted any lawyer that worked for any of these law firms?

4. Have you or any member of your family ever worked for their law firm in any capacity?

5. Have any of you, or any member of your family, ever been employed in any capacity by a lawyer or a law firm? If so, please state:

6. Do any of you related to:

- a. a lawyer;
- b. a judge;
- c. a school administrator;
- d. a teacher;
- e. a board member of any school board;
- f. a child psychologist/counselor;
- g. any child advocacy groups;
- h. law enforcement.

7. Have any of you, or any member of your family, ever filed a lawsuit?

8. Have any of you ever been sued or had a lawsuit filed against you for any reason?

9. Do all of you understand that this case is brought by minor plaintiffs under federal laws to collect damages from Autauga County Board of Education?

10. Do any of you have any objection to a person filing a lawsuit and

seeking money damages in a court of law?

11. Do any of you have any religious or other beliefs which would prohibit you from serving on a jury or have to make a judgment call?

12. Do any of you know of any reason whatsoever which would in any manner keep you from sitting as a juror if you are selected in this case?

13. Are you willing to impose and award punitive damages in this case, even though the law requires it?

14. Punitive damages are meant to punish and deter wrongful conduct of others. Would you award punitive damages in this case, if the evidence warranted such an award?

15. Is there anyone against punitive damages for any reason?

16. How do you feel about cases where a child is sexually abused at school, is this the type of case that a parent should file in Court against the school board?

17. How many of you would need a psychologist to tell your child suffered a mental injury if he/she was sexually abused?

18. Have you or a family member filed a sexual harassment claim against a school system?

19. Have you or a family member filed a sexual harassment claim for something that happened at a workplace?

20. State whether or not you or a family member have ever been accused of sexual harassment or supervised anyone accused of sexual harassment?

21. Have you or a family member filed a sexual harassment claim where the Equal Employment Opportunity Commission (EEOC) investigated a claim?

22. Does anyone know Larry Butler, the Superintendent of the Autauga County Board of Education?

22. Does anyone know Dene Cleveland, the Director of Human Resources for the Autauga County Board of Education?

23. Does anyone know any of the board members of the Autauga County Board of Education:

- a) Kelly Ingram – Chairperson;
- b) Art Wilkerson – Vice Chairperson;
- c) Ladronia Goodwin;
- d) Tammy Starnes;
- e) Dot Waller;
- f) Jerry Dubin;
- g) Ken Holland;
- h) Joe Turner;
- i) or any former member of the Autauga County Board of Education.

24. Does anyone know an administrator, teacher, or support personnel who works at the Prattville Elementary, Intermediate School or Prattville High School, during the 2004-2007 school year. If so, please state the person that you know and where they worked and their position.

25. State whether you had any discussions with that person about this case.

26. One or more of the following people may be called as witnesses in this case:

a)	Alfred Wadsworth	Chief of Police – Prattville
b)	Onya Johnson	Director of DHR
c)	James Harry	Prattville Police Officer
d)	Daryl Mangrum	Prattville Police Officer
e)	Lt. John McDaniel	Prattville Police Officer
f)	Janie Crawford	Receptionist for ACBE
g)	Marty Roney	Reporter for Montgomery Advertiser
h)	Lawrence Horn	Lives in Prattville
i)	Gloria Goodson	Secretary for ACBE
j)	Amy Boyd	Teacher at Prattville High School
k)	Lee Hicks	Principal at Prattville High School
l)	Katherine Russell	Works for DHR
m)	Kevin Smith	Works for DHR
n)	Roger Stifflemire	Work for ACBE, former Principal for Prattville High School
o)	Angel Garrett	Principal at Prattville Intermediate School
p)	Teresa Calhoun	Teacher at Prattville Intermediate School
q)	James Abraham	Principal at Prattville Elementary School
r)	Larry Butler	Superintendent of ACBE
s)	Dene Cleveland	Director of Human Resources for ACBE
t)	Lori McVay	Former teacher at Prattville High School

27. Does anyone now, or in the past, ever worked for a school board or were you affiliated with a school system in some capacity?

28. Is anyone a member or former member of the Alabama Education Association?

29. Is anyone a member or former member of the National Education Association?

30. Have any of you had a child attending the Autauga County Public Schools, specifically the Prattville Elementary, Prattville Intermediate and Prattville High School between the years of 2004-2007. If so, please state the person and school he or she attended.

31. Does anyone have the belief that just because the Plaintiffs have not sought medical assistance from either a psychiatrist or psychologist, they have not suffered some type of mental anguish, anxiety, stress or apprehension because of what happened to them?

32. Does anyone, if you were selected as a juror on this case, expect the Plaintiffs who were 9 year old girls to have told the same "story" of what happened to them on October 29th exactly the same each time they told their story?

33. Does anyone here who would not expect there to be some minor discrepancies or variations between their stories?

34. Is there anyone here who would not expect the Plaintiffs to have forgotten some details of their "story"?

35. Do you understand that this is not a criminal case and the burden of proof that the Plaintiffs have is not the same as a criminal case?

36. In a criminal case the proof would be beyond a reasonable doubt. In this case, it is by preponderance of the evidence. It is a lesser burden of a criminal case.

37. Have you or anyone in your immediate family been a victim or a witness to sexual abuse of children?

38. Have any of you or has anyone close to you ever been a victim to sexual abuse or inappropriate touching?

39. Do any of you have children who have victims of sexual abuse?

40. Have any of you notified the police or Department of Human Resources to respond to a victim that was sexually abused or experienced inappropriate touching?

41. Do any of you have strong feelings one way or the other about sexual abuse of school children?

42. Have you or anyone close to you ever been involved in sexual abuse or inappropriate touching?

43. Have you or any of your family members ever been a victim of sexual abuse?

44. Have any of your close friends or family members ever been a victim of sexual abuse?

45. Have any of you or your family members ever had any contact with child advocacy groups, such as Child Protect or any other group who is a advocate for child's rights?

46. Do you or anyone in your family have any special training knowledge or education experience in the field of child counseling, child psychology, or child advocacy?

47. Have any of you ever testified in a case involving child sexual abuse?

48. Can any of you think of any reasons why a child of sexual abuse may not report what had happened to he or she immediately?

49. Do you think that he or she might be emotionally traumatized?

50. Do you think he or she might be too distraught to talk about what had happened to him or her?

51. Consistent with your life experience, if someone suffered a traumatic event, such as child sexual abuse, do you think that person or that child would immediately discuss all of the details? Do you think that person's first concern would be something traumatic or terrifying that had just happened to him or her? Do you think they might forget some details?

52. Is there anyone out there who cannot understand why a child is not used to a courtroom and might be nervous to talk in front of everyone in the courtroom?

53. Do you think it might be even harder to talk about things of the sexual nature that happened to him or her?

54. Drawing on your life experience, if something traumatic happened or frightened you, do you think as you speak you would be able to focus in on all the specific details?

/s/Michael J. Crow
MICHAEL J. CROW (CR039)
Attorney for Plaintiffs

OF COUNSEL:

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/s/Robert D. Drummond
ROBERT D. DRUMMOND (DRU004)
Attorney for Plaintiffs

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of May, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Terry Wright, AIS 247561
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/s/Michael J. Crow
OF COUNSEL